



OPERATIONAL MEMO

TITLE:	PASRR COVID-19 UPDATE 2.5
SUPERSEDES NUMBER:	HCPF OM 20-030, HCPF OM 19-046 AND HCPF IM 20-015
EFFECTIVE DATE:	MARCH 26, 2020
DIVISION AND OFFICE:	CASE MANAGEMENT AND QUALITY PERFORMANCE, OFFICE OF COMMUNITY LIVING
PROGRAM AREA:	PREADMISSION SCREENING AND RESIDENT REVIEW (PASRR)
KEY WORDS:	PASRR, CORONAVIRUS, COVID-19, NURSING FACILITIES, HOSPITALS
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APPROVED BY: BONNIE SILVA	

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Purpose and Audience:

The purpose of this Operational Memo is to inform Pre-Admission Screening and Resident Review (PASRR) stakeholders of temporary changes to the PASRR process. The PASRR process requires all applicants to Medicaid-certified Nursing Facilities be given a preliminary assessment (Level I) to determine whether they might have a Serious Mental Illness (SMI) and/or an Intellectual or Developmental Disability (IDD). Those individuals who test positive at Level I screen are then referred for a more in-depth evaluation (Level II). The result of the Level II evaluation provides a determination of need, most appropriate setting, and a set of recommendations for services to inform the individual's care plan (42 CFR 483.100-138).

The audience for this communication includes eQHealth Solutions, PASRR Reviewers and Evaluators, Hospitals, Nursing Facilities, Single Entry Point agencies, Community Centered Boards, and all agencies and individuals involved in the PASRR process.

Information:

The Department of Health Care Policy & Financing (Department), working with the Centers for Medicare & Medicaid Services (CMS) is issuing temporary changes to the

PASSR process in response to the COVID-19 illness in Colorado. Effective March 26, 2020, the following provisions to the PASRR process shall be in place:

- Colorado received the 1135 waiver approval that includes the option for suspending PASRR and has suspended all new Level I and Level II screenings/evaluations for 30-days. The 1135 waiver will be in effect until the termination of the public health emergency (Section 1919(e)(7)).
- All new admissions may be treated like exempted hospital discharges. No Pre-Admission Level I Screen (PAS) is required to be submitted to eQHealth.
- Each individual who is admitted to a nursing facility (NF) will have PASRR postponed until the individual's 30th day of admission. Once the person is in the NF for 30 days, the NF will complete a Post Admission Level I (PAL) and submit to eQSuite.
- eQHealth Solutions will review the PAL and, if there is a PASRR condition, will complete a Resident Review Level II Evaluation as soon as resources are available. Already submitted Pre-Admission Level I Screens (PAS) and PAL requests will continue to be processed by eQHealth.
- New preadmission Level I screens and Level II evaluations are not required for residents who are being transferred between nursing facilities (NF) (42 C.F.R. §483.106(b)(4)).
- During a nursing facility transfer, if the receiving facility is not certain whether a Level I had been conducted at the resident's previous facility, a PAL may be conducted by the admitting facility as part of the admission. A Resident Review should follow a positive PAL.
- For current residents, Level II evaluations, Resident Reviews and Status Changes, should be completed remotely, using telehealth or other technological means. Providers may use Telehealth alternatives to meet existing needs for the provision of specialized services.
- For new admissions, Single Entry Point (SEP) agencies will not need a PASRR authorization in order to issue a certification for NF clients admitted on or after March 20, 2020. The start date of the certification for initial admissions shall be the date the client admitted to the NF with Medicaid as the pay source.
- For Pay Source Changes (PSC), the start date of the certification shall be the latter of: 1) the date the SEP receives the referral or 2) the date the NF is within

PASRR compliance, as shown through an authorization from eQHealth Solutions, if the PSC referral was received by the SEP after day 30 of admission. If the PSC referral was received prior to the resident being in the NF for 30 days, the SEP can issue a certification without the receipt of a PASRR authorizations.

- Nursing Facilities will be responsible for ensuring that a Post Admission Level I (PAL) is submitted to eQSuite upon the expiration of the 30-day exemption for all Level I and Level II new admissions. Nursing facilities shall continue to follow all necessary documentation protocols using their PASRR progress notes.
- The direction provided in this operational memo supersedes direction provided in Operational Memo 19-046 that was issued in October 2019. OM 19-046 indicated SEP agency shall issue the start date on the ULTC 100.2 without eQHealth Solutions' Resident Review or Status Change approval and that the nursing facility must provide the following information in order for the SEP to issue the start date: 1. Initial PASRR approval from the member's admission to the nursing facility. 2. Verification that the nursing facility submitted the Resident Review or Status Change into eQHealth Solutions' online portal.

Please submit any questions you may have to [HCPF HCBS questions@state.co.us](mailto:HCPF_HCBS_questions@state.co.us).

Additional resources regarding precautions are available through the [Centers for Disease Control and Prevention](https://www.cdc.gov) (CDC) and the [Colorado Department of Public Health and Environment](https://www.cdphe.co.gov) (CDPHE).

Attachment(s):

None

Department Contact:

Obi Agomoh

Obi.agomoh@state.co.us